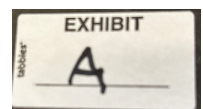


DECLARATION OF CHARLIE BLACK

I, Charlie Black, being of legal age and sound mind, do hereby as state and declare the following:

1. My name is Charlie Black.
2. I provide litigation support services for the legal community in Tulsa, Oklahoma.
3. Since 2001, I have assisted in over 8500 hours of trial time as a trial tech pulling up documents in Federal and State Court.
4. I have been retained by the law firm of Smolen & Roytman to provide trial tech services for the Plaintiff in the *Young v. CHC* case.
5. The *Young* trial is the first trial I have ever worked for Smolen & Roytman. I had no prior professional relationship with Smolen & Roytman.
6. On the afternoon of February 16, 2023, during the trial proceedings in *Young*, Plaintiff's counsel, Daniel Smolen, prompted me to publish page 16 of Plaintiff's Exhibit 44, which had already been admitted into evidence.
7. My intent was to pull up page 16 of Exhibit 44, just as Mr. Smolen requested. However, unfortunately, I keyed it in improperly and displayed the wrong document, Plaintiff's Exhibit 16. I immediately recognized the mistake and took Exhibit 16 down from the display. Exhibit 16 was published to the jury for less than one second.
8. Exhibit 16, which is an insurance declaration page, had not been admitted into evidence. I would never intentionally pull up any document that was not admitted. It was simply an accident.
9. The reason for this accident can be attributed to a new feature with my trial software program that automatically pulls up the document when you type in the ID, and in this mode, it also allows me to do off screen annotations. This feature is why Exhibit 16 came up so quickly, and fortunately I immediately pulled the document off the screen.
10. To make sure an accident like this doesn't happen again, I turned that feature off when I am searching for exhibits.



I, Charlie Black, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of knowledge.

Charlie Black

Charlie Black

Date: 2/21/23